

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

REAL SELLING GROUP, LLC

Plaintiff,

v.

ESN GROUP, INC.,

Defendant.

Civil Action No. 1:20-cv-01468-NRB

**STIPULATION AND [PROPOSED] ORDER
EXTENDING BRIEFING SCHEDULE ON DEFENDANT’S MOTION TO DISMISS**

Plaintiff Real Selling Group, LLL (“Plaintiff”) and Defendant ESN Group, Inc. (“Defendant”) (jointly the “Parties”), by and through their respective counsel, stipulate as follows

WHEREAS, the Parties stipulated to, and the Court so-ordered, a briefing schedule for Defendant’s Motion to Dismiss, which set September 11, 2020 as the date for Plaintiff’s opposition brief, and September 22, 2020 as the date for Defendant’s reply brief;

WHEREAS, at Plaintiff’s request, the Parties submitted a stipulation, which was so-ordered by the Court, that extended the date for Plaintiff’s opposition brief to September 25, 2020, and the date for Defendant’s reply brief to October 6, 2020;

WHEREAS, Defendant has agreed to Plaintiff’s request, based on Plaintiff’s counsel’s recent illness, to ask the Court to further extend the date for Plaintiff’s opposition brief to October 2, 2020, and Defendant’s reply brief to October 16, 2020; and

WHEREAS, the Parties have previously requested and received an extension from the Court on this motion, as described above,

IT IS HEREBY STIPULATED AND AGREED by and between the Parties that:

1. Plaintiff's response to Defendant's Motion to Dismiss shall be filed on or before October 2, 2020.
2. Defendant's reply in further support of its Motion shall be filed on or before October 16, 2020.

Dated: September 25, 2020


Respectfully Submitted,

Signature: /s/ Adam E. Engel
Adam E. Engel
The Engel law Group, PLLC
280 Madison Avenue, Suite 705
New York, NY 10016
(216) 665-8095
aee@elgpllc.com
Attorneys for Plaintiff

Signature: /s/ Stephen E. Paffrath
Stephen E. Paffrath
Diesch Law Group, APC
2207 Plaza Drive, Suite 300
Rocklin, CA 95765
(916) 740-6470
stephen@dieschlawgroup.com
Attorneys for Defendant

IT IS SO ORDERED.

DATED: September 29, 2020


Hon. Naomi Reice Buchwald